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June 7, 2019

Honorable Jon S. Tigar
San Francisco Courthouse
Courtroom 9 - 19th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: ***Eolas Technologies Inc. v. Amazon.com, Inc.***, No. 3:17-cv-3022-JST-JSC
(N.D. Cal.); ***Eolas Technologies Inc. v. Google LLC***, No. 3:17-cv-1138-JST-
JSC (N.D. Cal.)

Dear Judge Tigar:

I write regarding the upcoming June 20, 2019 hearing related to potential remedies for alleged prosecution bar violations in these cases.

In their briefing, Defendants have challenged the credibility of Eolas and McKool Smith witnesses and the veracity of their deposition testimony and sworn declarations. As such, each of Messrs. McKool, Burgess, Campbell, Budwin, Doyle, Stetson, and Swords will be available at the June 20, 2019 hearing to provide live testimony if the Court believes it would be helpful. Eolas is willing to permit this testimony, which will involve attorney-client privileged and work product information, under the same conditions previously agreed to by Eolas, Judge Corley, Amazon, and Google. *See* Dkt. 492, at 5-7 (discussing terms of production); *see also* Mar. 29, 2018 Hr'g. Tr. at 27:13-29:17 (same).

Respectfully submitted,

/s/ Jeffrey A. Lamken
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